



EL CERRITO POLICE DEPARTMENT

May 18, 1993

Ms. Donna R. Searcy, Secretary
 Federal Communications Commission
 1919 M Street N.W. - Room 222
 Washington, DC 20554

Re: PR Docket No. 92-235

Dear Ms. Searcy:

In the matter of the revision of the **Private Land Mobile Radio (PLMR) Services** and the modification of the policies governing those services (PR Docket No. 92-235, the replacement of Part 90 by Part 88), we have the following comments:

1. **WE DISAGREE WITH PR DOCKET 92-235 AS IT IS CURRENTLY PROPOSED.**
2. The fire, law enforcement and ambulance agencies of Contra Costa County serve a population of over 850,000. **The equipment costs alone to meet the proposed requirements of PR docket 92-235 are estimated at over FOURTEEN (14) MILLION DOLLARS.** The estimate is based on the 108 base stations and 1,737 mobile and portable radios in the county's largest police, fire and public works affected agencies. **County and city governments** are experiencing severe budget cutbacks, including layoffs, and simply **will not be able to meet the mandate as proposed.**
3. In effect, PR Docket 92-235 is a locally mandated program; therefore, we believe that **the federal government should provide a changeover funding source**, such as seed funding through block grants for local government agencies.
4. **The current licensee should remain the licensee** for the narrowband channels which will be split out of the wideband channel, **up to the year 2005**, which will be ten years from adoption of the FCC regulations. This will give local governments the time required to make such a tremendous changeover in equipment which the new narrowband channels will require.
5. **We disagree** that the frequency coordinating agencies would manage their proposed major role in administering channel exclusivity, and therefore **insist that public safety agencies** be enabled to **retain** their control over their radio traffic. If **channel exclusivity** is lost, public safety agencies' ability to respond to emergency requests from the public will suffer significantly.

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6. **We urge the members of the Federal Communications Commission to seek input from local, regional and state communication directors. To place the burden and costs of the problems addressed in this legislation on the backs of local government is not an appropriate answer.**

Respectfully submitted,


DANIEL G. GIVENS
Chief of Police

cc: City Manager
City Council Members
Mayor